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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

APR 19 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of
MARTHA J. HUBER, et al.

)
) MM Docket No. 93-51

) File Nos. BPH-911114ME,
) et al.

)
) For Construction Permit for a
) New FM Station on Channel 234A
) in New Albany, Indiana
)

TO: Honorable Richard L. Sippel
Administrative Law Judge

SUPPLEMENTAL DOCUMENT REQUEST

Martha J. Huber (Huber), by her attorneys, now requests that Rita Reyna Brent (Brent) produce the documents described below at the offices of Cohen and Berfield, P.C., 1129 20th Street, N.W., Suite 507, Washington, D.C. 20036, by May 4, 1993. Pursuant to Section 1.325(a) of the Commission's rules, Huber is not requesting that the Presiding Judge take action on this request at this time.

Definitions

As used in these document requests, the following terms have the following meanings:

1. "Applicant" shall mean Rita Reyna Brent and her attorneys, accountants, agents, principals, or representatives.

2. "Document" means without limitation the original (or if the original is not in your possession, custody, or control, an identical copy), or any nonidentical copy because of notations made on or attachments to such copy or otherwise, or any draft of any letter, memorandum, telegram, telex,

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report, record, study, handwritten notes, working paper, chart, paper, bill, receipt, index, business record, minutes, calendar, tape, disc, data sheet or data processing card, table, book, pamphlet or periodical, or any other written,

_____ printed _____ typed _____ filmed _____ graphic

8. These document requests call for the production of all documents within the possession, custody, or control of the applicant, its principals, any officers, directors, shareholders, agents, employees, advisors, or any other person under the control of any such party.

9. For each document produced, identify the request to which it is responsive. If responsive to more than one request, identify the requests to which the document is deemed primarily responsive.

10. If any requested document is withheld from production on the basis of a privilege, the applicant shall comply with Paragraph 6 of the Prehearing Conference Order, FCC 93M-114 (released March 19, 1993).

11. To the extent objections are made to any of the document requests, respond to that part of the request to which there is no objection and separately identify the objectionable part of the request and each ground for objection.

12. These requests are continuing in character. The parties are under a continuing obligation to supply documents responsive to these requests which are discovered during or after discovery in this proceeding. These documents should be ~~provided within 10 days after they are obtained or discovered~~

file with the Federal Communications Commission ("FCC" or "Commission") need not be produced. They may instead be identified by document title and date, the call letters of the station, or file numbers of the document or application.

14. If any document requested is currently unavailable, an explanation should be provided as to why it is now unavailable.

Documents Requested

1. All documents, including employment contracts, partnership agreements, or loan agreements, that relate to any commitment or assurance of any kind, of future involvement of the proposed integrated principal in any present or future occupations.

2. All documents that relate to any actual or possible employment, or independent contractor or agency relationship between any principal of an applicant and the applicant, and the nature of such possible employment, independent contractor, or agency relationship.

Respectfully submitted,

MARTHA J. HUBER

By Morton L. Berfield
Morton L. Berfield

By John J. Schauble
John J. Schauble

Cohen and Berfield, P.C.
1129 20th Street, NW, #507
Washington, DC 20036
(202) 466-8565

Date: April 19, 1993

Its Attorneys

CERTIFICATE OF SERVICE

I, Susie Cruz, do hereby certify that on the 19th day of April 1993, a copy of the foregoing "Supplemental Document Request" was sent first-class mail, postage prepaid to the following:

James Shook, Esq.*
Hearing Branch
Federal Communications Commission
2025 M Street, NW, Room 7212
Washington, DC 20554

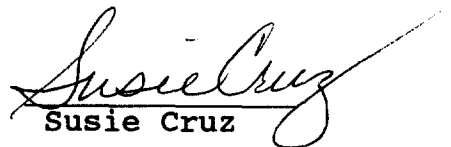
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Susie Cruz

* Hand Delivered